

**REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated June 8, 2007 has been received and its contents carefully reviewed.

Claims 67 and 70 are hereby amended. Support for may be found in at least page 10, lines 16-18 and Figs. 1 and 2 of the present invention. Claims 1 and 2 were previously canceled. Claims 24-66 were previously withdrawn. Accordingly, claims 3-70 are currently pending, with claims 24-66 withdrawn from consideration. Reexamination and reconsideration of the pending claims are respectfully requested.

In the Office Action, claims 3, 21 and 67-70 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,358,131 to Sakurai et al. (hereinafter "Sakurai"). Applicant respectfully traverses the rejection and requests reconsideration.

Independent claim 67 recites a system for polishing objects comprising, inter alia, "a first transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions;" and "a second transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions, the first transfer robot configured to transfer one of said objects to a polisher in the polishing unit, the second transfer robot being configured to transfer another of said objects to a polisher in the polishing unit...."

More specifically, Sakurai fails to disclose that the transfer robots are "designed to move said objects in both horizontal and vertical directions," as recited in the claim. Sakurai merely discloses robots 9 are designed to access cleaning machines 8 and lifts 21 of rotatable wafer carriers 14. See column 3, lines 34-38 and Figure 1. Thus, robots 9 can only move the wafers in vertical directions.

Accordingly, claim 67 is patentable over Sakurai. Accordingly, Applicant requests that the rejection be withdrawn. Similarly, claims 3, 21, 68 and 69, which variously depend from claim 67, are also patentable for at least the same reasons as discussed above.

Independent claim 70 recites a system for polishing surfaces of semi-conductor wafers comprising, inter alia, “a first transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions; and a second transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions, the first transfer robot and the second transfer robot both being configured to transfer semi-conductor wafers to a polisher in the polishing unit.”

As previously discussed, Sakurai fails to disclose at least the transfer robots are “designed to move said objects in both horizontal and vertical directions,” as recited in the claim. Thus, claim 70 is patentable over Sakurai. Accordingly, Applicant requests that the rejection be withdrawn.

In the Office Action, claims 3, 6-8, 10, 11, 21, 23 and 67-70 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,562,184 to Sommer (hereinafter “Sommer”). Applicant respectfully traverses the rejection and requests reconsideration.

Independent claim 67 recites a system for polishing objects comprising, inter alia, “a first transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions;” and “a second transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions, the first transfer robot configured to transfer one of said objects to a polisher in the polishing unit, the second transfer robot being configured to transfer another of said objects to a polisher in the polishing unit....”

More specifically, Sommer fails to disclose that the transfer robots are “designed to move said objects in both horizontal and vertical directions,” as recited in the claim. Sommer merely discloses corridor robots 138 and 140 are designed to move wafers between staging areas

128, 134 and 136 disposed between the first end 122 and the second end 124 of transfer corridor 104. See column 4, lines 56-62; column 5, lines 1-10 and Figure 1. First corridor robot 138 includes grippers 142 and 146 and the second corridor robot 140 includes grippers 144. The grippers assist in transferring wafers between staging areas. See column 6, lines 18-24. Thus, robots 138 and 140 can only move the wafers in horizontal directions.

Accordingly, claim 67 is patentable over Sommer. Accordingly, Applicant requests that the rejection be withdrawn. Similarly, claims 3, 6-8, 10, 11, 21, 23, 68 and 69, which variously depend from claim 67, are also patentable for at least the same reasons as discussed above.

Independent claim 70 recites a system for polishing surfaces of semi-conductor wafers comprising, inter alia, “a first transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions; and a second transfer robot located outside the polishing unit designed to move said objects in both horizontal and vertical directions, the first transfer robot and the second transfer robot both being configured to transfer semi-conductor wafers to a polisher in the polishing unit.”

As previously discussed, Sommer fails to disclose at least the transfer robots are “designed to move said objects in both horizontal and vertical directions,” as recited in the claim. Thus, claim 70 is patentable over Sommer. Accordingly, Applicant requests that the rejection be withdrawn.

Further, claims 4, 5 and 17-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sakurai in view of U.S. Patent No. 6,503,365 to Kim et al. (hereinafter “Kim”). Applicant respectfully traverses the rejection and requests reconsideration.

Applicant respectfully submits that Kim fails to cure the aforementioned defects associated with the teachings of Sakurai. None of the cited references, singly or in combination, teaches or suggests the transfer robots are “designed to move said objects in both horizontal and

vertical directions,” as recited in independent claim 67. For at least this reason, claims 4, 5 and 17-20, which variously depend from claim 67, are patentable over the applied references. Accordingly, Applicant requests that the rejection be withdrawn.

Further, claims 9, 12-16 and 22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Sakurai in view of U.S. Patent No. 5,948,203 to Wang (hereinafter “Wang”). Applicant respectfully traverses this rejection and requests reconsideration.

Applicant respectfully submits that Wang fails to cure the aforementioned defects associated with the teachings of Sakurai. None of the cited references, singly or in combination, teaches or suggests the transfer robots are “designed to move said objects in both horizontal and vertical directions,” as recited in independent claim 67. For at least this reason, claims 9, 12-16 and 22, which variously depend from claim 67, are patentable over the applied references. Accordingly, Applicant requests that the rejection be withdrawn.

The application is in a condition for allowance and favorable action is respectfully solicited. If for any reason the Examiner believes a conversation with the Applicant’s representative would facilitate the prosecution of this application, the Examiner is encouraged to contact the undersigned attorney at (202) 496-7500. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: September 10, 2007

Respectfully submitted,

for By Michael L. Anget (Reg. No. 46,522)  
Mark R. Kresloff  
Registration No.: 42,766  
MCKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(202) 496-7500  
Attorneys for Applicant